

1 of Exhibit 407 you were referring to?

2 JUDGE CHACHKIN: I'm referring to the second page of
3 Exhibit 407.

4 MR. TOPEL: Thank, thank you.

5 JUDGE CHACHKIN: Go ahead, Mr. Schonman.

6 BY MR. SCHONMAN:

7 Q Mrs. Duff, we can move on to Bureau Exhibit Number
8 408. That's a special meeting of TBN held on January 18,
9 1993. Did you attend this meeting, Mrs. Duff?

10 A I'm just reviewing the contents here. I am, I'm not
11 certain. I may have attended that meeting, but I, I, I don't
12 have a specific recollection of it.

13 Q Now this meeting involved NMTV, didn't it?

14 A Yes, it did. It also involved Jacksonville
15 Educators and CET, that's why I thought maybe I might have
16 been there.

17 Q And you're on the boards of both those --

18 A Yes.

19 Q -- other corporations, as well.

20 A Yes, I, I, I think I was there.

21 Q Mrs. Duff, were, were notes prepared regarding the
22 loans between TBN and CET, and between TBN and Jacksonville
23 Educators Broadcasting, Inc, and between TBN and NMTV? The
24 loans that are the, the subject of this special meeting.

25 A I believe so.

1 Q Three separate notes?

2 A I, I believe so. I'm, I'm not absolutely sure, no.
3 I'm not absolutely sure. I know NMTV, there was a, a note. I
4 believe that we did for all of the corporations.

5 Q Would that have been the first time that a note was
6 prepared between TBN and CET?

7 A I don't remember.

8 Q Do you --

9 A Whe -- whether that would have been the first time
10 or not for CET.

11 Q Do you know if that would have been the first time a
12 note was prepared between TBN and JEB?

13 A I'm not sure of that, either.

14 Q Mrs. Duff, can you take a look at Bureau Exhibit
15 Number 409, please. Take a moment to familiarize yourself
16 with, with that document. Then I'm specifically interested in
17 learning more information about the paragraph on the bottom of
18 page one and the top of page two. What are the services that
19 Shaffer Communications Group is, is providing?

20 A They would find sites for us for the, the
21 low-powers, especially in conjunc -- in conjunction with an
22 upcoming window filing. They would provide sites depending on
23 the level of the need, whether it would be bare land or space
24 on somebody's tower.

25 Q Did Shaffer, in fact, perform services for NMTV at

1 any time?

2 A Yes.

3 Q Do you have any knowledge as to why Mr. Horvath is
4 writing to Shaffer on TBN letterhead regarding NMTV matters?

5 A I don't know.

6 Q Did you see this letter on or about the time it was
7 mailed to Shaffer Communications?

8 A I don't remember seeing this letter. It doesn't
9 look like I was even copied on it.

10 Q Who on behalf of NMTV authorized making Shaffer an
11 agent?

12 A I had already done that, so this letter wouldn't
13 have even been necessary. I had direct communication with,
14 with Shaffer regarding this, long before Mr. Horvath wrote
15 this letter.

16 JUDGE CHACHKIN: Well, he lists himself as low-power
17 coordinator. Did Mr., Mr. Horvath hold that position for TBN?

18 MRS. DUFF: Yes, he did.

19 BY MR. SCHONMAN:

20 Q Can you look at pages three and four and five and
21 six of that exhibit, Exhibit 409. Am I correct that the NMTV
22 site acquis -- acquisition check list is identical to the
23 Trinity site acquisition check list?

24 A Yes.

25 Q Can you turn to Bureau Exhibit Number 410. This

1 identifies the job functions for a low-power coordinator on
2 page one. And page two and three describe scope of
3 responsibilities, qualifications, and reporting relationship.

4 Mrs. Duff, have you ever seen these documents before?

5 A Yes.

6 Q Are all three pages linked together somehow as a
7 unit?

8 A Pretty much.

9 Q Who prepared pages one, two, and three?

10 A I believe Ben Miller prepared these pages. I may
11 have had some input, referencing the need for interface
12 between by department and the, the low-power coordinator.

13 Q What, what are you referring to in these documents
14 for that input?

15 A On the job functions, on page one. There were
16 certain things that I would require from the low-power
17 coordinator, and some of those things are listed here.

18 Q What individuals did, did these functions and
19 responsibilities apply to?

20 A I'm not sure I understand your question.

21 Q Who was the low-power coordinator?

22 A This list was prepared in advance of hiring this
23 individual, and the person that we hired was George Horvath.

24 Q So these would have been prepared when,
25 approximately?

1 A Approximately, I guess, George, he -- like '91, late
2 '91.

3 Q Mrs. Duff, can you turn to Bureau Exhibit Number
4 411. And that's a letter from May and Dunne to you at TBN
5 dated February 11, 1993. Could you take a moment to look
6 through this. And I'm specifically interested in the first
7 paragraph, the second sentence, which says: in reviewing the
8 list of potential Trinity and NMTV filings that Kevin
9 prepared, and then it goes on. And my question for you is do
10 you know why Mr. Dunne is including a discussion about NMTV
11 filings in a letter directed to you at TBN?

12 A No, I do not.

13 Q Did you ask him about it?

14 A Yes. Yes.

15 Q What is it you asked him?

16 A I asked him why he was including TBN and NMTV in the
17 same breath, so to speak, that we needed to have things
18 separate. And --

19 Q What did he respond?

20 A He responded that --

21 Q The record won't pick that up.

22 A The Pollock sign, so. The Pollock sign. You know,
23 he just, I guess it was a, a lapse of, of memory.

24 JUDGE CHACHKIN: Lapse of memory about what?

25 MRS. DUFF: That we were to keep things separate.

1 JUDGE CHACHKIN: As of what date were you to keep
2 things separate?

3 MRS. DUFF: With Colby, started billing separately
4 back in, I believe, in September.

5 JUDGE CHACHKIN: What year? '92?

6 MRS. DUFF: I believe it was, it, it was earlier
7 than this, I believe.

8 BY MR. SCHONMAN:

9 Q Mrs. Duff, we can move on to Bureau Exhibit Number
10 412. That's a special meeting of NMTV's board on --

11 MR. COHEN: Did, Your Honor, did we get an answer to
12 your question?

13 JUDGE CHACHKIN: No. What --

14 MR. COHEN: I'm sorry.

15 JUDGE CHACHKIN: I'd, I'd asked for, as of what
16 date, and you said you believe it was earlier than
17 February 11th, 1993. When, when did you and Mr. May reach
18 some kind of understanding that he was supposed to bill
19 separately business NMTV and TBN?

20 MRS. DUFF: I would have to go back to the, I'd have
21 to, to go back to the billing. I, I don't remember exactly
22 when it was.

23 JUDGE CHACHKIN: Go ahead, Mr. Schonman.

24 MR. SCHONMAN: Thank you. And I, I apologize for
25 interrupting. I didn't realize there was a question

1 outstanding.

2 BY MR. SCHONMAN:

3 Q We can move on to Bureau Exhibit Number 412, a
4 special meeting of NMTV's board on April 20, 1993. Would you
5 take a moment to read through that, Mrs. Duff.

6 (Off the record.)

7 (Back on the record.)

8 Q Have you read through that, Mrs. Duff?

9 A Yes.

10 Q I notice that Reverend Crouch abstained on all
11 matters discussed at this meeting, is that correct?

12 A Yes.

13 Q Do you know why Reverend Crouch abstained on all
14 matters voted on at this meeting?

15 A I, I wasn't aware as to why, that, that, no, I
16 wasn't. I wasn't aware of why, at that time.

17 Q Do you know now why he abstained?

18 A I believe that, at that time, I found out later that
19 Mr. May had advised him that he should, he should abstain from
20 voting in, at this particular meeting.

21 Q Do you know why that advice was given?

22 A To show, in other words, that, that he was not in a
23 controlling position after the issues had been raised. This
24 was his attorney's advice to him.

25 Q Up to this point, hadn't Reverend Crouch voted on

1 every matter that came up for a vote at NMTV?

2 A Yes.

3 Q And were you surprised at this meeting when Reverend
4 Crouch abstained?

5 A I was a little bit surprised that he, that he
6 abstained.

7 Q Did you ask him, at that time, why he abstained?

8 A No, I didn't.

9 Q Did you inquire of anyone, at that time, why he
10 abstained?

11 A I had talked to Colby May and he told me later that
12 he had advised Mr. Crouch to, to abstain.

13 Q How much later?

14 A Oh, it was quite a bit later that, in fact, I think
15 it was, it was even in preparation, oh, gosh, it was prior to
16 my leave, it was prior to my deposition, some, sometime along
17 that time.

18 Q So it wasn't --

19 A Because I was reviewing the documents and it, and
20 the issue came up.

21 Q It wasn't until the fall of 1993 that, that you
22 learned why Mr. Crouch --

23 A Right.

24 Q -- had abstained?

25 A Right.

1 Q Mrs. Duff, can we turn to Bureau Exhibit Number 413.

2 JUDGE CHACHKIN: Why don't we take a luncheon recess
3 now till 1:30.

4 (Whereupon a recess was taken from 12:25 p.m. to
5 reconvene at 1:30 p.m.)
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A F T E R N O O N S E S S I O N

JUDGE CHACHKIN: Back on the record. Mr. Schonman?

MR. SCHONMAN: Thank you, Your Honor.

BY MR. SCHONMAN:

Q Mrs. Duff, can we move to Bureau Exhibit Number 413. And that's a Form 990 for the year 1992 for NMTV. Can you tell me how Goodrich, Goodyear, and Heinz came to prepare this form?

A I relied on TBN's Accounting Department to negotiate their services in connection with the business services agreement.

Q Did you review this before it was filed?

A I don't recall reviewing this, no.

Q Do you know who signed it on behalf of NMTV? The version that I have does not have a signature on page five.

A The one I have here, let's see. You're on page five?

Q Yes.

A It doesn't, mine doesn't have a signature either.

Q Do you recall who, on behalf of NMTV, signed it?

A No, sir. I do not.

Q Mrs. Duff, at, I, I'd like to move over briefly to your direct testimony, which is Trinity exhibit, TDF Exhibit 101, specifically page six.

A Volume One?

1 Q Volume One. Mrs. Duff, at the top of page six, you
2 state that the minorities on the board have caused the company
3 to retain a minority attorney, Mr. Tyrone Brown, when they
4 felt that action was warranted to review the issues being
5 considered at the FCC, and they have participated at numerous
6 meetings and in various covert actions. Do you see that?

7 A Yes.

8 Q Who retained Tyrone Brown?

9 A The Board made the decision to hire an attorney, and
10 I specifically talked to Colby May, and he made the contact
11 with Mr. Brown. And I talked to him personally and engaged
12 him for NMTV.

13 Q When you say that the board retained Mr. Brown, are
14 you referring to the TBN board or the NMTV board?

15 A NMTV board.

16 Q Now for how long did Mr. Brown render services on
17 behalf of NMTV?

18 A I don't rem -- it wasn't a terribly long time. It,
19 it was several months, but it wasn't for an extended period of
20 time.

21 Q He no longer represents NMTV --

22 A No.

23 Q -- in any matters?

24 A No.

25 Q On page 50 of your written testimony here, paragraph

1 76.

2 A I beg your pardon, what part, page again?

3 Q Page 50, paragraph 76. You testified NMTV also has
4 its own membership in the National Association of
5 Broadcasters. TBN is not a member of NAB. But I bet it would
6 be helpful for NMTV to have access to NAB's legal, renewal,
7 and other services. When did NMTV become a member of the
8 National Association of Broadcasters?

9 A I believe it was early in '92.

10 Q Did Colby May counsel you to, to have NA -- NMTV
11 join NAB?

12 A No.

13 MR. SCHONMAN: All right. Your Honor, at this time
14 I have some house cleaning measures, some matters that I
15 wanted to just go over before I conclude my portion of the
16 cross-examination, so there's going to be some flipping back
17 and forth to different Bureau volumes. I'd like to move to
18 Volume Three of the Bureau's exhibits, Exhibit Number 149.

19 JUDGE CHACHKIN: I believe the witness has it.

20 BY MR. SCHONMAN:

21 Q Mrs. Duff, do you have that?

22 A Yes.

23 Q Mrs. Duff, is that your signature on page ten of
24 this application? And this is a low-power application for
25 Fresno, California.

1 A Yes.

2 Q Now on page seven of this application, you certified
3 that NMTV was entitled to claim a minority preference,
4 correct?

5 A Yes.

6 Q When you certified that NMTV was entitled to a
7 minority preference in this application, did you consult with
8 any counsel?

9 A Yes, I believe. Yes, with Colby May.

10 Q Now you have previous con -- previously consulted
11 with Mr. May, when you certified in 1984.

12 A Yes.

13 Q And you, you, you requested his counsel again ---

14 A Yes.

15 Q -- in 1987?

16 A Yes, I did.

17 Q Why did you consult him again in 1987?

18 A I just, this is just something that came up again,
19 and I just thought it would be wise to just talk to him about
20 it and, and make sure that, that, that he felt comfortable
21 with us doing this, and he said, he said yes. Just a, just a
22 reassurance.

23 Q Now on page 13 is a list of communities that I
24 understand NMTV also applied for low-power stations?

25 A Yes.

1 Q And did NMTV also certify that it was entitled to a
2 minority preference in those applications, as well?

3 A I don't know. I, I would need to look at each one
4 to make sure, because I don't have the recollection.

5 Q We're going to jump to Volume Four of the Bureau's
6 exhibits, Exhibit Number 201. Volume 201 is an application
7 for a new low-power station to serve Salt Lake City, Utah, and
8 that was filed on June 24, 1988. Do you have that before you,
9 Mrs. Duff?

10 A Yes.

11 Q Is that your signature on page eight of this
12 application?

13 A Yes.

14 Q And if you turn back to page seven, am I correct
15 that NMTV certified that it was entitled in that application
16 to claim a minority preference?

17 A Yes.

18 Q Now this application was filed, as I said, in June,
19 1988. At the time that you certified to a minority preference
20 in this application, did you again consult with any counsel?

21 A I don't think I did. I, I think I was satisfied
22 that, you know, that, that there weren't any changes in the
23 rules at that particular time. I don't think I asked him
24 anymore after that.

25 Q Now on page 14 of the application, it states that

1 NMTV intended to file for applications -- I'm sorry, for
2 low-power stations in Hartford, Connecticut; Columbus, Ohio;
3 and also Wilmington, Delaware. And did, in fact, NMTV file
4 low-power applications for those communities?

5 A Yes, I believe we did.

6 Q Do you have any recollection as to whether NMTV
7 certified to being entitled to a minority preference in those
8 applications?

9 A Not without looking. I, I, we, most likely we did.
10 If that was our purpose.

11 Q But you can't recall?

12 A No, I can't recall.

13 Q Same volume, we can move to Bureau Exhibit Number
14 247. And 247 is an application for a new low-power station in
15 Toledo, Ohio. Do you have that before you?

16 A Yes.

17 Q Mrs. Duff, is that your signature on page five,
18 above the date March the 6th, 1989?

19 A Yes.

20 Q And if you turn back a page, to page four, am I
21 correct that NMTV certified to being entitled and was claiming
22 a minority preference in this application?

23 A Yes.

24 Q Did you or anyone associated with NMTV consult any
25 counsel before certifying to a minority preference in this

1 application?

2 A I don't remember them doing it in this case, no.

3 Q And on page nine, the application indicates that
4 NMTV intended to file for low-power stations in the
5 communities of Toledo, Ohio; Charlotte, North Carolina;
6 Greenville, South Carolina; Little Rock, Arkansas; and --
7 well, this one is for Toledo. Do you recall that NMTV, in
8 fact, filed applications for those communities?

9 A Yes, we did.

10 Q Do you recall whether NMTV certified to being
11 entitled to a minority preference in those applications?

12 A It's my recollection that, that we did.

13 Q That you did?

14 A Yes.

15 Q Do you recall whether you or anyone associated with
16 NMTV sought counsel before certifying to being entitled to a
17 minority preference in these applications?

18 A I don't think we did that, in that, I don't believe
19 I did at that, in that particular window, no.

20 Q All right. We can move to Volume Five of the
21 Bureau's exhibits, Exhibit Number 285. And Exhibit 285 is an
22 application by Minority, National Minority TV, Inc., for a new
23 low-power station at Stockton, California. Do you have that
24 before you, Mrs. Duff?

25 A Yes.

1 Q Is that your signature on page five of this
2 application?

3 A Yes.

4 Q On page four, am I correct that NMTV claimed a
5 minority preference in this application?

6 A Yes.

7 Q And did you or anyone associated with NMTV consult
8 counsel before certifying?

9 A I don't remember consulting with them in this case.

10 Q And on page nine, NMTV states that it intended to
11 file applications for Columbia, South Carolina; Portland,
12 Maine; Sacramento, California; Huntington, West Virginia. And
13 did, in fact, NMTV file applications for low-power stations in
14 those communities?

15 A Yes.

16 Q And do you recall whether NMTV certified to being
17 entitled to a minority preference in thos applications?

18 A I believe we did.

19 Q Do you recall whether NMTV sought counsel before so
20 certifying?

21 A I don't recall having done that.

22 Q Do you recall whether NMTV has filed any
23 applications for new low-power stations in 1993?

24 A Yes.

25 Q And would those applications include low-power

1 applications for Scranton, Pennsylvania; Geneva, New York;
2 Charlottesville, Virginia; Knoxville, Tennessee; and Richmond,
3 Virginia?

4 A That sounds, sounds correct.

5 Q Do you recall whether NMTV certified to being
6 entitled to a minority preference in any of those
7 applications?

8 A I believe we did not.

9 Q You did not?

10 A No.

11 Q Then why did NMTV not certify to being entitled to a
12 minority preference in those applications?

13 A I consulted with counsel and I was advised that
14 since the issue was in question, that we would refrain from
15 asking for the miniort (sic), minority preference until the
16 FCC made its determination.

17 Q And who is the counsel you were referring to?

18 A May and Dunne.

19 Q Your Honor, if we could have about a minute.

20 JUDGE CHACHKIN: All right. We'll go off the
21 record.

22 (Whereupon a recess was taken.)

23 JUDGE CHACHKIN: Back on the record.

24 BY MR. SCHONMAN:

25 Q Mrs. Duff, I'd like to turn to Exhibit 43 of the

1 Bureau's exhibit, exhibits, which is in Volume One. Now just
2 to orient you, what I'm interested in finding out some
3 information about it the fund raising.

4 A Forty-three?

5 Q Yes. And I'm interested in page six of Bureau
6 Exhibit Number 43. Now in, in terms of fund raising,
7 Mrs. Duff, I think you've testified that there was a, a fund
8 raising event, a telethon, in late 1980.

9 A That's correct.

10 Q Were there any telethons subsequent to that 1980
11 telethon in which funds were raised for Translator TV, Inc.,
12 or NMTV?

13 A There was a long period of time where there were no
14 funds raised. Not until we had the opportunity for Odessa in
15 1987, I believe, were there any funds raised. There was no
16 activity in that corporation; therefore, there wasn't any need
17 for funds.

18 Q I'm sorry, so the first telethon subsequent to the
19 1980 telethon would have been when?

20 A When we first found out that we were going to be
21 able to file for Odessa. We would have had a fund raiser for
22 that project.

23 Q That would have been then 1987?

24 A A, around that time, yes.

25 Q Now if you take a look at Bureau Exhibit Number 43,

1 page six, there's a reference in this "Praise the -- Praise
2 the Lord" newsletter to raising money for low bro -- low-power
3 broadcast stations. Do you see that? It's the top column
4 across, the center, center item.

5 A Um-hum.

6 Q Do you recall whether Translator TV, Inc., as the
7 company was then known, received any money from, from
8 contributions solicited in this newsletter?

9 A I wouldn't have any direct knowledge without, you
10 know, going to our records, but this, I, I wouldn't know.

11 Q Did the solicitation on page six of Bureau Exhibit 43
12 include a solic -- a solicitation for monies for TBN stations,
13 as well as Translator TV, Inc. station?

14 A Well, in this particular caption, I, I, the only
15 thing I can say is I would just have to go by what this says
16 here. I, I don't have any recollection other than what, you
17 know, I don't have a recollection. All I can do is just read
18 what this says.

19 Q Well, what does it say?

20 A Well, it says the 1,000 watt low-powered stations
21 can be, can reach entire cities 24-hours a day. Applications
22 currently on file include Washington, D.C.; Las Vegas; San
23 Francisco; and approximately 20 more major American cities.
24 Each station costs \$110,000 approximately, average building
25 cost. So.

1 Q Did, isn't it a fact that NMTV had an application
2 filing for a Washington, D.C. suburb?

3 A Yes.

4 Q Do you know if TBN had a, an application for a
5 low-power station pending for Washington, D.C., or its suburb?

6 A No, I don't believe so.

7 Q Did NM -- strike that. Did Translator TV, Inc.,
8 have an application filing at this time for a low-power
9 station in San Francisco?

10 A I believe we did.

11 Q How about Las Vegas?

12 A I don't remember Las Vegas. Possibly. I, I don't
13 remember all the different ones.

14 Q Mrs. Duff, can you take a look at Bureau Exhibit
15 Number 28, please. Page seven. Do you see that list of
16 communities?

17 A Yes.

18 Q Does that help reflect -- refresh your recollection
19 as to whether there is this, an application pending on
20 Translator TV, Inc.'s behalf for Las Vegas?

21 A Yes.

22 Q We can move on to Bureau Exhibit Number 53, page 12.
23 And Exhibit 53 is a "Praise the Lord" newsletter for
24 October/November 1982. And on page 12, the left-hand column,
25 second from the top, there is a reference to solicitation for

1 money for a low-power station.

2 MR. TOPEL: We need some help.

3 MR. SCHONMAN: Exhibit 53, page 12, left-hand
4 column.

5 MRS. DUFF: This is it.

6 BY MR. SCHONMAN:

7 Q Left hand column, second from the top. Do you see
8 that?

9 A Yes.

10 Q And there's a reference to soliciting money for low-
11 power stations. Isn't it a fact that this solicitation was
12 for NMTV's stations -- NMTV applications?

13 A It app -- it appears to be.

14 Q And, at that time, the state -- the company was
15 known as Translator TV, Inc.?

16 A That's correct.

17 Q We can move to Bureau Exhibit Number 56, page 10.
18 With respect, Mrs. Duff, with respect to the newsletter you
19 were just looking at, do you know whether any money was raised
20 for Translator TV, Inc.?

21 A No, sir. I, I don't even remember seeing these
22 newsletters. It wasn't my practice to review the newsletters
23 necessarily.

24 Q All right. Now Exhibit 56, which you are turning
25 to, is a "Praise the Lord" newsletter for April/May 1983. And

1 I'd like you to look at page ten.

2 MR. TOPEL: Excuse me. My copy has six pages.

3 BY MR. SCHONMAN:

4 Q Well, it's the last page of, of this exhibit. And
5 you'll see two columns. I'm interested in directing your
6 attention to the, the item second from the top, on the
7 left-hand side, and there's a reference to a solicitation for
8 money for low-power stations. Do you see that?

9 A Yes.

10 Q Isn't it a fact that money was solicited by TBN for
11 NM -- for Translator TV, Inc.'s applications for low-power
12 stations here.

13 A Yes, it was in the newsletter.

14 Q Do you know if Translator TV, Inc., received any
15 money in connection with the solicitation?

16 A The only thing I could say is if, if it came in
17 designated for that purpose, it would have been attributed to,
18 to Translator on the books. That's the way it would have been
19 handled.

20 Q Mrs. Duff, are you familiar with any solicitation by
21 TBN for low-power stations or applications that did not
22 produce any money?

23 A I, I don't have an answer for that. I, it's not
24 something that I would have had reason to research. I, I
25 don't have an answer for that.

1 Q Are you familiar with any of the projects that are
2 identified in the newsletters in which money was solicited,
3 are you familiar with any of these projects not producing any
4 revenues?

5 A I don't -- as a part of my responsibilities, I do
6 not go through the designation list, unless there is something
7 specific that I am looking for, and I'll ask for something
8 specific, and I won't necessary just go through the whole list
9 of designated projects. That's not a practice of mine.

10 MR. SCHONMAN: I have no further questions, Your
11 Honor.

12 JUDGE CHACHKIN: Is this "Joy in the Morning" the
13 same program that was later produced by NMTV?

14 MRS. DUFF: Yes, sir.

15 JUDGE CHACHKIN: And this is the same Mr. McClellan,
16 I assume, that produced the program?

17 MRS. DUFF: Yes, sir.

18 JUDGE CHACHKIN: You, you refer to a low-power
19 coordinator, Mr. Horvath.

20 MRS. DUFF: Yes.

21 JUDGE CHACHKIN: He was low-power coordinator for
22 TBN, was he not?

23 MRS. DUFF: Yes, sir.

24 JUDGE CHACHKIN: Did NMTV ever have its own
25 low-power coordinator?

1 MRS. DUFF: No, sir.

2 JUDGE CHACHKIN: Any re-direct?

3 MR. McCURDY: We have further questions.

4 JUDGE CHACHKIN: Oh, I'm sorry, you have some
5 questions. Go ahead.

6 MR. McCURDY: Never be rude.

7 JUDGE CHACHKIN: All right.

8 CROSS EXAMINATION

9 BY MR. McCURDY:

10 Q Mrs. Duff, could you turn to Glendale Exhibit 104.

11 A The Volume Two?

12 Q Yes, it would be Volume Two. Did you find it?

13 A Yes.

14 Q Okay. Now you referred to this document earlier.

15 Could you just look at it for a second. Now this is a letter
16 that you sent to NMTV employees regarding travel arrangements,
17 is that correct?

18 A Yes.

19 Q Okay. And what was the misunderstanding regarding
20 the booking of travel arrangements for NMTV personnel?

21 A There were times when an employee would make their
22 own travel arrangements and they wouldn't necessarily get the
23 best rate, so I instructed the station manager to, to have all
24 those arrangements done through my office. And, in this
25 particular situation, TBN's policy would have been different,